

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**PATRICIA McENTEE,
CHRISTINE GEARIN,
JULIA CARLSON,
MICHELLE PROVITOLA,
JULIE DIGIROLAMO,
DOROTHY CLARKE,
JEANNE ARSENAULT,
STACEY BARNES,
MARCO BUZZANGA,
DONNA CIULLA,
JENNIFER JASILEWICZ,
LAUREN MELLO,
ERIKA CARDINALE,
JENNIFER CORDY,
LAUREN HETRICK,
MARIAM MOMJIAN,
PATRICIA MURPHY,
RACHAEL SOUCIA,
FELICIA DELA CRUZ,
ANGELA CHANDLER,**

Plaintiffs,

v.

**BETH ISRAEL LAHEY HEALTH, INC.,
BETH ISRAEL DEACONESS
HOSPITAL- PLYMOUTH, INC.;
NORTHEAST HOSPITAL
CORPORATION;
BETH ISRAEL DEACONESS MEDICAL
CENTER, INC.;
WINCHESTER HOSPITAL;
BETH ISRAEL LAHEY HEALTH
PRIMARY CARE- MAPLE STREET;
MOUNT AUBURN HOSPITAL;
NORTHEAST PROFESSIONAL
REGISTRY OF NURSES, INC.**

Defendants.

Civil Action No.: 1:22-cv-11952-DLC

ASSENTED TO MOTION FOR LEAVE TO FILE THE ATTACHED FIRST AMENDED COMPLAINT

COMES NOW, the Plaintiffs, by and through undersigned counsel, and respectfully moves the Court for leave Pursuant to Fed. R. Civ. P. 15(a)(2) to file the attached First Amended Complaint. In support of this Motion, counsel says the following:

1. On November 16, 2022 the Plaintiffs filed their original complaint and a summons was issued on November 17, 2022.
2. On February 7, 2023, Plaintiffs requested that Defendants waive services of the summons for the original Complaint and the Defendants agreed to waive service of the original Complaint on that date.
3. Six (6) additional Plaintiffs have been added to the amended complaint.
4. Defendants' counsel has agreed to accept service on behalf of the above Defendants once an Amended Complaint has been filed.

WHEREFORE, counsel prays the Motion be granted in the interests of justice and judicial economy and he be allowed to file the attached First Amended Complaint.

Dated this 9th day of February, 2023.

Respectfully submitted,
The Plaintiffs,
By their attorneys,

DATED: February 9, 2023

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.
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DATED: February 9, 2023

/s/ Joseph Spinale., Esq.
Joseph Spinale, Esq.
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LOCAL RULE 7.1. CERTIFICATION

I, Richard C. Chambers, Jr., Esq., hereby certify that, pursuant to L.R. 7.1(a)(2), I conferred with Defendants' counsel who assented to the relief requested herein.

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent this day to those participants indicated as non-registered participants.

DATED: February 9, 2023

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.